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November 13, 2017

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, D.C. 20554

Re: Expanding Flexible Use in Mid-Band Spectrum between 3.7 and 24 GHz; GN Docket No. 17-183

Dear Ms. Dortch:

In response to the above-referenced *Notice of Inquiry* regarding flexible use in the mid-band spectrum, undersigned counsel, on behalf of Enlace Christian Television, Inc. ("Enlace"), submits these comments concerning joint-use of the 3.7 - 4.2 GHz C-band downlink frequency band by satellite and terrestrial mobile operators.

Enlace is a customer of Intelsat and it has reviewed their market-based proposal with Intel for satellite-managed joint-use of C-band spectrum. Enlace has an important interest in protecting the quality of satellite services in the C-band spectrum, which is core to the success of its ministry and business operations. Enlace needs to avoid the risk of interference that would result from co-frequency, co-coverage sharing, and to ensure the 99.999% reliability that our service area and viewers, and millions of American television viewers and radio listeners deserve and expect.

Enlace is concerned that joint-use of C-band spectrum presents the real potential for compromising service, and it seeks better use and business certainty regarding satellite use of C-band going forward. Accordingly, in the event the Commission decides to impose a mechanism for sharing, Enlace would prefer Intelsat's solution over other methods of sharing because of the protections it provides for our ministry's interests and the interests of our viewers and supporters.

If there are any questions concerning this submission, please contact this office directly.

Respectfully Symitted

Attorney for Frace Christian Television, Inc.

CMM/gmc